

## EXHIBIT 17

**In the Matter of**

Case No. 18-cv-05775 (ERK)(TAM)

STAR AUTO SALES OF BAYSIDE, INC., et al.

v.

VOYNOW, BAYARD, WHYTE AND COMPANY LLP, et al.

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**Deposition of Vincent Bucolo**

*Wednesday, November 2, 2022*

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Company

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK .

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STAR AUTO SALES OF BAYSIDE, INC.  
(d/b/a STAR TOYOTA OF BAYSIDE),  
STAR AUTO SALES OF QUEENS, LLC  
(d/b/a STAR SUBARU), STAR HYUNDAI  
LLC (d/b/a STAR HYUNDAI), STAR  
NISSAN, INC. (d/b/a STAR NISSAN),  
METRO CHRYSLER PLYMOUTH INC. (d/b/a  
STAR CHRYSLER JEEP DODGE) STAR AUTO  
SALES OF QUEENS COUNTY LLC (d/b/a  
STAR FIAT) and STAR AUTO SALES OF  
QUEENS VILLAGE LLC (d/b/a STAR  
MITSUBISHI),

Plaintiffs,

-against-

VOYNOW, BAYARD, WHYTE and COMPANY  
LLP, HUGH WHYTE, and RANDALL  
FRANZEN,

Case No.  
18-cv-05775  
(ERK) (TAM)

Defendants.

-----x

November 2, 2022  
10:43 a.m.

Deposition of VINCENT BUCOLO, taken by  
Plaintiffs, pursuant to Subpoena, held at the  
offices of Milman Labuda PLLC, 3000 Marcus  
Avenue, Suite 3W8, Lake Success, New York,  
before Lisa Hiesiger, a Shorthand Reporter  
and Notary Public within and for the State of  
New York.

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A P P E A R A N C E S :

MILMAN LABUDA PLLC  
Attorneys for Plaintiffs  
3000 Marcus Avenue, Suite 3W8  
Lake Success, New York 11042

By: JAMIE S. FELSEN, ESQ.  
jamie@mllaborlaw.com  
JEREMY M. KOUFAKIS, ESQ.  
jeremy@mllaborlaw.com

MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN P.C.  
Attorneys for Defendants  
620 Freedom Business Center, Suite 405  
King of Prussia, Pennsylvania 19406

By: MAUREEN P. FITZGERALD, ESQ.  
mpfitzgerald@mdwcg.com

Also Present:

JACQUELINE CUTILLO  
ROBERT SEIBEL  
STEVE RAMBAM (Via Telephone)

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Bucolo

V I N C E N T B U C O L O, having been first  
duly sworn by Lisa Hiesiger, a Notary Public, was  
called as a witness and testified as follows:

EXAMINATION BY MR. FELSEN:

Q. Good morning, Mr. Bucolo.

A. Good morning.

Q. My name is Jamie Felsen. I'm an  
attorney. I represent various Star auto  
dealership entities. For the sake of simplicity,  
for the rest of the day I'm going to refer to the  
various Star entities simply as Star, do you  
understand that?

A. Okay.

Q. Star commenced a lawsuit against  
Voynow Bayard Whyte and Company, LLP, Hugh Whyte  
and Randall Franzen, and you're here today to  
answer questions and provide answers to those  
questions related to your employment at Voynow  
and the litigation.

I will refer to Voynow Bayard Whyte  
and Company, LLP simply as Voynow, do you  
understand that?

A. Yes.

Q. You understand that you're not a

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2 Q. And did most of the automotive client  
3 at Voynow utilize Reynolds and Reynolds?

4 A. The two most popular systems I can  
5 recall are Reynolds and Reynolds and ADP. I  
6 believe the clients I worked on used Reynolds and  
7 Reynolds more often.

8 Q. And Star used Reynolds and Reynolds,  
9 correct?

10 A. I believe so, yes.

11 Q. When you worked at Voynow did you  
12 ever enter any transactions into the Reynolds  
13 system for clients?

14 A. I did not, no.

15 Q. Did any of your co-workers that  
16 you're aware of ever enter any transactions into  
17 Reynolds for clients?

18 A. No. Our standard practice was to  
19 have read only access.

20 Q. How do you know that Voynow's access  
21 was read only?

22 A. I forget why, but they told me don't  
23 worry, you can't screw anything up, you can only  
24 print, when I was pretty new.

25 Q. Who told you that?